

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOINT PRETRIAL MEMORANDUM

The Defendant, Julio Marin, and the United States of America hereby submit this pretrial memorandum.

1. Counsel for both parties have conferred by phone and agreed to submit this joint report. (The Government is aware of the Defendant's request herein for a further conference, and has taken no position on whether such further conference is appropriate.
2. Defendant has almost completed review of the CDs and DVDs provided by the government in discovery. He anticipates that he will complete his review by the end of this week.
3. Until Defendant's review of discovery is complete, his counsel cannot determine what if any further steps should be taken at this stage of the case.
4. Accordingly, Defendant requests a further status conference before the Magistrate Judge to take place in approximately three weeks.

5. Because additional time is needed for the defendant to complete review of discovery and for his counsel to consider what if any further steps should be taken at this stage, Defendant agrees that the Speedy Trial Clock should be tolled between this date and the further the status conference requested by Defendant (assuming that such further conference is ordered). .

Respectfully submitted,

MICHAEL J. SULLIVAN,
United States Attorney

Date: January 30, 2006

Todd E. Newhouse
Assistant United States Attorney

JULIO MARIN, By His Attorney

s/ Myles Jacobson

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